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FILED

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

MAY 8 2008
5-8-2008
MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

ANGELICA BALTISTA

(Name of the plaintiff or plaintiffs)

v.

COOK COUNTY

(Name of the defendant or defendants)

08cv2673
JUDGE CASTILLO
MAG. JUDGE DENLOW

COMPLAINT OF EMPLOYMENT DISCRIMINATION

- This is an action for employment discrimination.
- The plaintiff is ANGELICA BALTISTA of the
county of COOK in the state of ILLINOIS
- The defendant is COOK COUNTY, whose
street address is 50 WEST WASHINGTON ST.
(city) CHICAGO (county) COOK (state) ILLINOIS (ZIP) 60602
(Defendant's telephone number) () - _____
- The plaintiff sought employment or was employed by the defendant at (street address)
50 W. WASHINGTON ST. RICHARD DALEY CENTER (city) CHICAGO
(county) COOK (state) ILLINOIS (ZIP code) 60602
- The plaintiff [check one box]
 - ☐ was denied employment by the defendant.
 - ☒ was hired and is still employed by the defendant.
 - ☐ was employed but is no longer employed by the defendant.

6. The defendant discriminated against the plaintiff on or about, or beginning on or about, (month) MARCH, (day) _____, (year) 2005.

7.1 (Choose paragraph 7.1 or 7.2, do not complete both.)

(a) The defendant is not a federal governmental agency, and the plaintiff [check one box] ☒ has ☒ has filed a charge or charges against the defendant asserting the acts of discrimination indicated in this complaint with any of the following government agencies:

- (i) ☒ the United States Equal Employment Opportunity Commission, on or about (month) OCTOBER (day) 30 (year) 2006.
- (ii) ☐ the Illinois Department of Human Rights, on or about (month) _____ (day) _____ (year) _____.

(b) If charges were filed with an agency indicated above, a copy of the charge is attached. ☒ YES. ☐ NO, but plaintiff will file a copy of the charge within 14 days.

It is the policy of both the Equal Employment Opportunity Commission and the Illinois Department of Human Rights to cross-file with the other agency all charges received. The plaintiff has no reason to believe that this policy was not followed in this case.

7.2 The defendant is a federal governmental agency, and

(a) the plaintiff previously filed a Complaint of Employment Discrimination with the defendant asserting the acts of discrimination indicated in this court complaint.

- ☐ Yes (month) _____ (day) _____ (year) _____
- ☐ No, did not file Complaint of Employment Discrimination

2. The plaintiff received a Final Agency Decision on (month) _____ (day) _____ (year) _____.

c. Attached is a copy of the

a. Complaint of Employment Discrimination,

- ☒ YES ☐ NO, but a copy will be filed within 14 days.

(ii) Final Agency Decision

- ☒ YES ☐ NO, but a copy will be filed within 14 days.

8. *(Complete paragraph 8 only if defendant is not a federal governmental agency.)*

(a) ☐ the United States Equal Employment Opportunity Commission has not issued a *Notice of Right to Sue*.

(b) ☒ the United States Equal Employment Opportunity Commission has issued a *Notice of Right to Sue*, which was received by the plaintiff on (month) FEBRUARY (day) 11 (year) 2008 a copy of which *Notice* is attached to this complaint.

9. The defendant discriminated against the plaintiff because of the plaintiff's *[check only those that apply]*:

(a) ☐ Age (Age Discrimination Employment Act).

(b) ☒ Color (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).

(c) ☒ Disability (Americans with Disabilities Act or Rehabilitation Act)

(d) ☒ National Origin (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).

(e) ☒ Race (Title VII of the Civil Rights Act of 1964 and 42 U.S.C. §1981).

(f) ☐ Religion (Title VII of the Civil Rights Act of 1964)

(g) ☒ Sex (Title VII of the Civil Rights Act of 1964)

10. If the defendant is a state, county, municipal (city, town or village) or other local governmental agency, plaintiff further alleges discrimination on the basis of race, color, or national origin (42 U.S.C. § 1983).

11. Jurisdiction over the statutory violation alleged is conferred as follows: for Title VII claims by 28 U.S.C. §1331, 28 U.S.C. §1343(a)(3), and 42 U.S.C. §2000e-5(f)(3); for 42 U.S.C. §1981 and §1983 by 42 U.S.C. §1988; for the A.D.E.A. by 42 U.S.C. §12117; for the Rehabilitation Act, 29 U.S.C. § 791.

12. The defendant *[check only those that apply]*

(a) ☐ failed to hire the plaintiff.

(b) ☐ terminated the plaintiff's employment.

(c) ☒ failed to promote the plaintiff.

- (d) ☐ failed to reasonably accommodate the plaintiff's religion.
- (e) ☒ failed to reasonably accommodate the plaintiff's disabilities.
- (f) ☒ failed to stop harassment;
- (g) ☒ retaliated against the plaintiff because the plaintiff did something to assert rights protected by the laws identified in paragraphs 9 and 10 above;
- (h) ☒ other (specify): SEE PARAGRAPH 13
- _____
- _____
- _____
- _____
- _____

13. The facts supporting the plaintiff's claim of discrimination are as follows:
- SEE ATTACHED
- _____
- _____
- _____
- _____
- _____

14. **[AGE DISCRIMINATION ONLY]** Defendant knowingly, intentionally, and willfully discriminated against the plaintiff.

15. The plaintiff demands that the case be tried by a jury. ☒ YES ☐ NO

16. THEREFORE, the plaintiff asks that the court grant the following relief to the plaintiff
[check only those that apply]

- (a) ☐ Direct the defendant to hire the plaintiff.
- (b) ☐ Direct the defendant to re-employ the plaintiff.
- (c) ☒ Direct the defendant to promote the plaintiff.
- (d) ☐ Direct the defendant to reasonably accommodate the plaintiff's religion.
- (e) ☒ Direct the defendant to reasonably accommodate the plaintiff's disabilities.

(f) ☐ Direct the defendant to (specify): _____

(g) ☒ If available, grant the plaintiff appropriate injunctive relief, lost wages, liquidated/double damages, front pay, compensatory damages, punitive damages, prejudgment interest, post-judgment interest, and costs, including reasonable attorney fees and expert witness fees.

(h) ☒ Grant such other relief as the Court may find appropriate.

(Plaintiff's signature)

Angelica M. Bautista

(Plaintiff's name)

ANGELICA M. BAUTISTA

(Plaintiff's street address)

400 E. RANDOLPH ST.

APT. 1725

(City) CHICAGO

(State)

ILLINOIS

(ZIP)

60601-7310

(Plaintiff's telephone number) (312) - 856-1121

Date:

May 8, 2008

EEOC Form 5 (501)

CHARGE OF DISCRIMINATION <small>This form is affected by the Privacy Act of 1974. See enclosed Privacy Act Statement and other information before completing this form.</small>		Charge Presented To: Agency(ies) Charge No(s): <div style="display: flex; justify-content: space-between;"> <div> <input type="checkbox"/> FEPA <input checked="" type="checkbox"/> EEOC </div> <div style="text-align: right;"> 440-2007-00657 </div> </div>	
Illinois Department Of Human Rights and EEOC <small>State or local Agency, if any</small>			
Name (indicate Mr., Ms., Mrs.) Angelica M. Bautista		Home Phone (Incl. Area Code) (312) 856-1121	Date of Birth 11-1-1948
Street Address 400 E. Randolph, #1725		City, State and ZIP Code Chicago, IL 60601	
Named is the Employer, Labor Organization, Employment Agency, Apprenticeship Committee, or State or Local Government Agency That I Believe Discriminated Against Me or Others. (If more than two, list under PARTICULARS below.)			
Name CLERK OF CIRCUIT COURT OF COOK CTY		No. Employees, Members 500 or More	Phone No. (Include Area Code) (312) 603-5035
Street Address 50 W. Washington, 10th Floor		City, State and ZIP Code Chicago, IL 60602	
Name 		No. Employees, Members 	Phone No. (Include Area Code)
Street Address 		City, State and ZIP Code 	
DISCRIMINATION BASED ON (Check appropriate box(es).) <div style="display: flex; flex-wrap: wrap; padding: 5px;"> <div style="margin-right: 10px;"><input checked="" type="checkbox"/> RACE</div> <div style="margin-right: 10px;"><input type="checkbox"/> COLOR</div> <div style="margin-right: 10px;"><input checked="" type="checkbox"/> SEX</div> <div style="margin-right: 10px;"><input type="checkbox"/> RELIGION</div> <div style="margin-right: 10px;"><input type="checkbox"/> NATIONAL ORIGIN</div> <div style="margin-right: 10px;"><input type="checkbox"/> RETALIATION</div> <div style="margin-right: 10px;"><input type="checkbox"/> AGE</div> <div style="margin-right: 10px;"><input type="checkbox"/> DISABILITY</div> <div style="margin-right: 10px;"><input type="checkbox"/> OTHER (Specify below.)</div> </div>			DATE(S) DISCRIMINATION TOOK PLACE <div style="display: flex; justify-content: space-between;"> <div> Earliest 01-01-2006 </div> <div> Latest 10-30-2006 </div> </div> <div style="text-align: center; margin-top: 10px;"> <input type="checkbox"/> CONTINUING ACTION </div>
THE PARTICULARS ARE (If additional paper is needed, attach extra sheet(s)): <p>I began my employment with Respondent in May 1995. My current position is Bond Forfeiture Clerk in the Bond Refund Department. During my employment, I have been subjected to different terms and conditions of employment by my supervisors and I have been physically assaulted by a co-worker. On May 2, 2006, I applied for two (2) Administrative Assistant positions for which I was qualified. On June 19, 2006, I learned that both positions had been filled by Non-Asian females with less seniority than I have. On August 30, 2006, I was subjected to harassment by the supervisors. I have complained to the supervisors about the different terms and conditions of employment, the physical assault by a co-worker and the harassment, however, it continues.</p> <p>I believe I have been discriminated against because of my race, Asian and my sex, female, in violation of Title VII of the Civil Rights Act of 1964, as amended.</p>			
<div style="font-size: 2em; font-weight: bold; transform: rotate(-5deg);">RECEIVED EEOC</div> <div style="font-size: 1.2em; font-weight: bold; transform: rotate(-5deg);">OCT 30 2006</div> <div style="font-size: 1.2em; font-weight: bold; transform: rotate(-5deg);">CHICAGO DISTRICT OFC</div>			
I want this charge filed with both the EEOC and the State or local Agency, if any. I will advise the agencies if I change my address or phone number and I will cooperate fully with them in the processing of my charge in accordance with their procedures.		NOTARY - When necessary for State and Local Agency Requirements	
I declare under penalty of perjury that the above is true and correct.		I swear or affirm that I have read the above charge and that it is true to the best of my knowledge, information and belief. SIGNATURE OF COMPLAINANT	
<div style="display: flex; justify-content: space-between;"> <div> Oct 30, 2006 <small>Date</small> </div> <div> <small>Charging Party Signature</small> </div> </div>		SUBSCRIBED AND SWORN TO BEFORE ME THIS DATE <small>(month, day, year)</small>	

Read instructions on the Reverse Side of this form before completing this form.

You must completely fill out this form and sign the last page.

The Commission will then determine if it has the right under the law to investigate your employment claim.

Whether you complete this form in our office or mail it to the EEOC, it must be received by the Commission within 300 days of the date of the alleged discrimination.

(Please Print)

NAME ANGELICA M. BAUTISTA DATE 10/30/2006
 (First) (Middle Name or Initial) (Last)
 ADDRESS 400 E. RANDOLPH ST. UNIT 1725 CITY CHICAGO
 STATE IL. ZIP 60601-7310 COUNTY COOK
 HOME TELEPHONE NUMBER 312 856-1121 DAYTIME TELEPHONE NUMBER 312 731-6848
 SOCIAL SECURITY NUMBER 052-62-2895 SEX F
 DATE OF BIRTH 11/01/48 CURRENT AGE 57

Please provide the name of an individual at a different address who is always able to reach you.

NAME GRACE M. LIBALDO ADDRESS 50 STURBRIDGE DR.
 CITY PISCATAWAY STATE NJ ZIP 08854 TELEPHONE NUMBER HOME 732 699-9477
CELL 732 735-3275

Type of organization that you believe discriminated against you.

☐ Private Company ☐ State Government ☒ County Government ☐ City Government
☐ Educational Institution: ☐ Public ☐ Private ☐ Employment Agency ☐ Union

What is the nature of organization's business (what does the company do) CLERICAL SUPPORT FOR COOK COUNTY COURT
 Provide the full name of the organization that you believe discriminated against you. Provide the address and telephone number location where the alleged discrimination occurred.

Name of organization CLERK OF THE CIRCUIT OF COOK COUNTY Address DALEY CENTER
50 W. WASHINGTONS
 City CHICAGO State IL. Zip Code 60602
 Telephone Number 312 603-5035 County COOK

Total number of employees > or < 2,000 (Cook County employees)

If you are, or have been, employed by the organization provide the following information.

Job Title BOND FORFEITURE CLERK Dates of Employment: From MAY 1995 To PRESENT
 Present or Last Salary \$36,000+ Department BAIL BONDS Name of Supervisor ANNETTE EDWARDS

In the spaces below, please list each issue and basis (Race, Color, Sex, Religion, National Origin, Age, Disability or Equal Pay).

Examples of some common issues (action taken): Discharge; Layoff; Harassment; Transfer; Unequal Pay; Demotion; Job Elimination; Failure to Recall; Failure to Hire; Failure to Accommodate (Disability and Religion Only); Unequal Terms and Conditions; Failure to Promote.

Fill in a separate section for each issue and basis. ISSUE AND BASIS

Issue/Action taken HARASSMENT SEX Date of Action
MY SUPERVISORS ALWAYS HARASS ME WITH MY WORK ALWAYS CLAIMING THAT A MALE
EMPLOYEE CAN DO MY MONTH'S WORK IN 2 DAYS WHICH IS A TOTAL LIE &
HARRASSMENT IS PLS. SEE BACK PAGE

DISCRIMINATION
HARRASSMENTS FOR GOING TO THE BATHROOM THAT HAD AGGRAVATED
 ME FOR INTENTIONALLY DISTRESSING ME BECAUSE THEY PLOTTED THINGS TO GIVE THEM A REASON
 Basis/type of discrimination TO DISCRIMINATE & HARRASS ME & DISTRESS ME THAT I HAVE
 Reason given for action TO BE HOSPITALIZED FOR 7 DAYS RIGHT AFTER HARRASSING ME I WENT TO THE
 emergency Rm. where they had admitted me with 200/90 BLOOD PRESSURE

Explain why you feel the action taken against you was discriminatory I was being singled out all the
 time, my supervisors plotted things to have reasons to harass me. They continue
 with each other to discriminate me.

If you believe you were discriminated against because of a disability, state your disability. KNOWING THAT
 I HAVE VALVE REPLACEMENT (OPEN HEART SURGERY) THEY INTENTIONALLY DISTRESS ME
 EMOTIONALLY. EVERY NOW & THEN CONFRONTS & HARRASS ME (ACCUSE & ABUSE ME W/ THEIR
 If you believe the action taken against you occurred because you opposed unlawful discrimination, filed a discrimination charge,
 participated in an investigation of one of the laws enforced by EEOC or associated with someone protected by one of the laws
 enforced by EEOC, tell us what you did. Include dates, charge numbers and/or the name and title of the person to whom you
 complained of discrimination. WHEN THE ASST. COMPTROLLER HAD HARRASSED ME, I FILED A GRIEVANCE
 WITH THE UNION. WHEN HE LEARNED ABOUT IT, I WAS WRITTEN UP WITH ALL THE LIES &
 FABRICATIONS THAT THEY CAN THINK ABOUT.

Do you have any documents to support your claim of discrimination?

Yes ☒

No ☐

Have you filed a charge regarding this situation with the Illinois Department of Human Rights (IDHR)?

Yes ☐

No ☒

If yes, provide charge number _____

Have you filed a charge with the EEOC before?

Yes ☐

No ☒

If yes, provide charge number _____

If you are represented by an attorney, please provide name, address and telephone number.

I declare under penalty of perjury that the foregoing is true and correct.

SIGNATURE

Angelica Gant

DATE

10/30/06

PRIVACY ACT STATEMENT: This form is covered by the Privacy Act of 1974: Public Law 93-579. Authority for requesting personal data
 the uses thereof are:

1. FORM NUMBER/TITLE/DATE. EEOC Form 283, Charge Questionnaire (12/93).

2. AUTHORITY. 42 U.S.C. § 2000e-5(b), 29 U.S.C. § 211, 29 U.S.C. § 626, 42 U.S.C. 12117(a)

3. PRINCIPAL PURPOSE. The purpose of this questionnaire is to solicit information in an acceptable form consistent with statutory
 requirements to enable the Commission to act on matters within its jurisdiction. When this form constitutes the only timely written
 statement of allegations of employment discrimination, the Commission will, consistent with 29 CFR 1601.12(b) and 29 CFR 1626.89(b),
 consider it to
 be a sufficient charge of discrimination under the relevant statute(s).

4. ROUTINE USES. Information provided on this form will be used by Commission employees to determine the existence of facts relevant
 to a decision as to whether the Commission has jurisdiction over allegations of employment discrimination and to provide such charge



U.S. Department of Justice

Civil Rights Division

NOTICE OF RIGHT TO SUE
WITHIN 90 DAYS

CERTIFIED MAIL
5072 6676

950 Pennsylvania Avenue, N.W.
Karen Ferguson, EMP, PHB, Room 4239
Washington, DC 20530

February 5, 2008

Ms. Angelica M. Bautista
400 E. Randolph, #1725
Chicago, IL 60601

Re: EEOC Charge Against Clerk of Circuit Court of Cook County
No. 440200700657

Dear Ms. Bautista:

Because you filed the above charge with the Equal Employment Opportunity Commission, and more than 180 days have elapsed since the date the Commission assumed jurisdiction over the charge, and no suit based thereon has been filed by this Department, and because you have specifically requested this Notice, you are hereby notified that you have the right to institute a civil action under Title VII of the Civil Rights Act of 1964, as amended, 42 U.S.C. 2000e, et seq., against the above-named respondent.

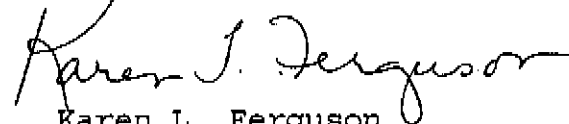
If you choose to commence a civil action, such suit must be filed in the appropriate Court within 90 days of your receipt of this Notice. If you cannot afford or are unable to retain an attorney to represent you, the Court may, at its discretion, assist you in obtaining an attorney. If you plan to ask the Court to help you find an attorney, you must make this request of the Court in the form and manner it requires. Your request to the Court should be made well before the end of the time period mentioned above. A request for representation does not relieve you of the obligation to file suit within this 90-day period.

This Notice should not be taken to mean that the Department of Justice has made a judgment as to whether or not your case is meritorious.

Sincerely,

Grace Chung Becker
Acting Assistant Attorney General
Civil Rights Division

by


Karen L. Ferguson
Supervisory Civil Rights Analyst
Employment Litigation Section

cc: Chicago District Office, EEOC
Clerk of Circuit Court of Cook County

Paragraph 13 {continued}

1. I began working for the Clerk of the Circuit Court of Cook County on May 1995.
2. I worked in the Accounting Department. I was in-charged of processing Bond Forfeiture for District I. I was also assigned doing Bond Transfer, Bond Merge and Bond Refund and as a cashier in the cage for 13 years period.
3. With all my different work assignments, I have done my work without difficulties.
4. I finished my work in a timely manner, neatly, legibly and without error or very seldom if, I have one.
5. I'm proud to say that, I did my job well.
6. I didn't get any complain of any sort, about my work from management.
7. But with all my good works, management, haven't given me an honest good review.
8. I noticed that every time, on the day of my review, management will give me all the negative comments about my work which were all fabricated.
9. I believe, if I was not doing my work right, which was not the case, management would have called my attention, right from the beginning. And knowing them, they would.
10. Management wouldn't acknowledge my good work, instead, had graded me so low in comparison to the other White and African American employees *AND SO WITH MALE EMPLOYEES.*
11.)
12. On June 02, 2006, a co-worker, Evelyn Huntt assaulted me at work.
13. My thigh was so bruised and swollen, because of the assault.
14. But management still had connived and protected Evelyn Huntt, an African American. *MY NATIONAL ORIGIN, COLOR, AND MY DISABILITY, SEX AND TO RETALIATE -*
15. Even my safety wasn't taken into consideration. Because of my race, I'm an *BEING ASIAN-FILIPINO AND A FEMALE HAVE A HEART CONDITION.*
16. After giving management an account of my injury, our comptroller, Wasiu Fashina and assistant comptroller, Kevin Murphy had connived and protected Evelyn Huntt who is of the same race, African American.
17. In one of my meetings with Labor Relation chief, Pat Horne, she asked me if I have documentations of the incident. I said, yes.
18. Pat Horne said, "Oh, good now, we have enough proof to get Evelyn Huntt." this time. Pat Horne was kind of elated when she learned that I have enough documentations. Pat Horne told me that, Evelyn Huntt did some wrong doings before and they don't have proof in support to the complain. And she was glad that I have complete documentations.
19. I know that Evelyn Huntt have done some wrongdoings to the employee who worked with her before me. The employee whom I replaced. That employee had always told me every time she comes to our office, "Angelica, she hates me more than she hates you." But she had not told me what had happened between them. As she knows and I told her what Evelyn Huntt did to me. That employee was

transferred to another department and was given a promotion. Was that to cover for what Evelyn Huntt had done to her? To appease her. Evelyn Huntt had always been tolerated and protected by management.

20. On Nov. 14, 2006, I went to the office of our comptroller, Wasiu Fashina, and made a request if, he can move Evelyn Huntt farther away from me because, I feel threatened by Evelyn Huntts' hostile behavior.
21. But because of my race, ^{MY NATIONAL ORIGIN, MY SEX AND COLOR, DISABILITY AND RETALIATE} management didn't care to listen to my plea. Instead of moving her farther from me, management moved her closer right in front of me, to spite me.
22. Evelyn Huntt, was able to assault me again, the second time, on Feb. 07, 2007. Which cause my being on disability.
23. Management all the time knew that, Evelyn Huntt had past wrong doings and was capable of doing more harm, but, didn't do anything to prevent it. Instead, management put me in a more vulnerable position by moving her closer, right in front of me. ^{BECAUSE OF MY NATIONAL ORIGIN, COLOR, TO RETALIATE & MY DISABILITY}
24. I felt very disappointed with management, not taking into consideration, my safety and well being. I was thinking, had I been of the same race, Evelyn Huntt would have been moved farther. Management had discriminated me so bad obviously, because of my race, ^{MY NATIONAL ORIGIN, COLOR AND DISABILITY, SEX & RETALIATION.}
25. Management had given me the work responsibilities of other employees, while those employees enjoy doing nothing and can goof around with their computers looking at their pictures, talk for hours on the telephone, overstay on their breaktime, check their lottery tickets on their desk or talk with one another at their convenience. Without complain or comment from management, because, most of them were doing the same thing.
26. While I was being harassed for just going to the bathroom. ^{BECAUSE OF MY NATIONAL ORIGIN, RACE, COLOR MY DISABILITY AND TO RETALIATE AND}
27. I know, my manager, Eapen Varughese and his assistant, Annette Edwards were ^{BEING A FEMALE - SEX} harassing and discriminating me in connivance with their superiors. In particular, assistant comptroller, Kevin Murphy an African American who had harassed, threatened and discriminated me in a closed door without having representation on my part, in retaliation for my filing a grievance against them. ^{BECAUSE OF MY SEX, COLOR, NATIONAL ORIGIN, MY DISABILITY}
28. And I believed Kevin Murphy, was the brain of all this ^{AND I AM NOT DISABLED.}
29. Management had abused their power and authority that, every time they send me communications in the mail, while I'm on disability, they always attached a resignation paper for me to sign. They really want to get rid of me but why? I don't see any reason but, my being of different race ^{AND NATIONAL ORIGIN, BEING A FEMALE - SEX, DISABILITY AND TO RETALIATE}
30. Annette Edwards, assistant manager, pointed her finger right to my face to harass ^{AND MY COLOR} and discriminate me. ^{BECAUSE OF MY RACE, NATIONAL ORIGIN, COLOR, DISABILITY AND TO RETALIATE}
31. I feel that, what she had done, pointing finger at my face was really very lowly and degrading to my well being. A civilized person will not do that to another human being and she did it to me. ^{BECAUSE OF MY RACE, COLOR, NATIONAL ORIGIN, MY DISABILITY AND TO RETALIATE}
32. With my good work, management had as always, given me a low grade on my review. No matter how I prove to them of my good work, it doesn't matter, because I'm of different race, ^{DIFFERENT COLOR, NATIONAL ORIGIN, I HAVE DISABILITY AND TO RETALIATE,}
33. Giving me a low grade, will give them the reason not to promote me. Because ^{AND BECAUSE OF MY SEX,} promotions were only meant to African American and White employees, ^{MALE, AND BEING A FEMALE BEING COMPARED ALWAYS TO A MALE EMPLOYEE}

34. I was denied of my vacation and was harassed and threatened by my manager, Eapen Varughese. *WHICH OTHER EMPLOYEES CAN ENJOY BECAUSE I'M ASIAN-FILIPINO WITH DISABILITY FROM DIFFERENT COLOR, NATIONAL ORIGIN AND TO RETALIATE*
35. Eapen said that, if he thought of not approving my vacation, he can do so. A benefit that every employees enjoy but not me.
36. I was also denied of working on my lunch hour to make up for leaving early. Which I know all of the employees enjoyed.
37. Eapen also threatened me that if my work, will not all be finished by the time I go on vacation, he will not approve it. *HE DOES THIS TO ME TO RETALIATE AND BECAUSE OF MY NATIONAL ORIGIN, SEX & DISABILITY*
38. This threat from my manager, Eapen was a total abuse of power and authority a total discrimination because, when other employees go on vacation, Eapen delegate their works to me.
39. I was denied of training and classes that were offered and open to all employees.
40. And to make it worse, management had singled me out and let me attend a seminar that is not applicable for me, but for slackers.
41. My manager, Eapen had always compared me to a male employee to discredit and discriminate and harass me. Being a female, he always compared me that a male employee can do my work, of one month in two days and can do it better. *HE DOES THIS BECAUSE OF MY RACE, NATIONAL ORIGIN, COLOR AND DISABILITY, SE*
42. Eapen had always said this for everybody to hear, saying it repeatedly to let people assume that I can't cope up with my work, to harass and discredit me. When in fact, I was doing other employees work.
43. I have had two heart surgeries.
44. Management having the knowledge of my condition, ignored this fact and even violated my right of confidentiality and privacy because even my co-workers knew about it.
45. Knowing this fact, management had given me strenuous works to do which was not even my job. I believe because of my race, *MY NATIONAL ORIGIN, COLOR, DISABILITY AND TO RETALIATE.*
46. Management let me carry boxes of checks to be brought to the cage for the night.
47. I asked my manager, Eapen if a co-worker can help me carry one of the boxes he answered me, "no I want you to do it."
48. I believe, my manager, Eapen was doing it on purpose and he got the approval from the higher-ups. *BECAUSE OF MY RACE, NATIONAL ORIGIN, DISABILITY, COLOR, SEX AND TO RETALIATE.*
49. Even if those tasks that my manager, Eapen asked me to do were very strenuous in my condition, I can't complain, for fear of losing my job. I can feel my heart beating so fast, I'm all sweaty and tired.
50. I believe management had given me this kind of work to aggravate me and make my condition worst because of my race, *MY COLOR, MY NATIONAL ORIGIN, MY DISABILITY AND TO RETALIATE AND MY SEX.*
51. I have said this because management was really very mean, they always discriminate me and single me out.
52. When I reminded management of my condition, the more they had given me strenuous work to do, to spite me. *BECAUSE THEY KNOW OF MY DISABILITY, MY HEART CONDITION.*
53. There was a time when Annette Edwards, assistant manager had sent me to pull some bonds in the files, and she really doesn't need them. She just wanted to exhaust me. *KNOWING OF MY DISABILITY, MY HEART CONDITION.*
54. Management had intentionally distress me by harassing me and putting me always in confrontation knowing, that I can't handle the emotional pressure because of my heart condition.

55. Management had used and abused their power and authority, who knows that they don't have to answer for their actions against me because, I don't have political connections.
56. I know that management was just waiting for me to refuse their order, for them to have the reason to fire me. But I always followed what they asked me to do, for fear of losing my job.
57. As one of my co-workers had said to me, "Angelica hang in there, they were really doing it to you because management wants you to quit."
58. On March 30, 2005 , Assistant Comptroller ,Kevin Murphy had written me up in retaliation for my filing a grievance,
59. I was threatened and harassed in a closed door without representation on my part.
60. On May 02, 2006, I applied for two different open positons that I know, I'm well qualified of, I was denied for both positions. And I later learned, that both positions were awarded to two African American employees ~~WHOWERE NOT DISABLED~~
61. It was really unfortunate that management of Cook County, can tolerate such filthy practices and bad behavior and denied me of act of righteousness and decency, to the detriment of a helpless subordinate like me ~~WHO HADN'T COMPLAINED~~
62. On Aug. 30, 2006 I was hospitalized because I was harassed by my manager, Eapen V. I went to the ER of Northwestern Memorial Hospital right after I was harassed. I felt like I'm having a heart attack, my blood rushed up to my head and like I'm feeling shortness of breath. My blood pressure was 200/92 that I was admitted immediately and was confined for seven days. I was harassed for going to the bathroom. Management had connived to single me out in this situation. We are four employees in the dept., we were given different assigned breaktimes with one employee on break, three employees should be in their work post, but as always, I was the only one left in the dept. and was doing all the work I didn't complain but after a while, I felt like going to the bathroom and I ask my manager where are the rest of us because I'm going to the bathroom and he answered me by doing a gesture that he doesn't know. After a while, I can't hold it any longer, I raised my hand and declared I'm going to the bathroom and I got up and left. When I came back after five minutes, he had so many questions for me. He asked where have you been ? Where did you go? Why did you leave without anybody in the dept.? You are not supposed to leave without anybody in the dept. he had reprimanded me in the middle of the room where everybody could hear even the customers at the counter. I said Eapen all of you supervisors were there when I left and I told you where I'm going, but he continued harassing me I felt bad in embarrassment I felt like my blood rushed to my face. I was so red and my face was hot. I decided to take a sick time for the rest of the day and go home. I asked for his permission and told him that Eapen, I don't feel well, I have to go. I'm taking a sick time for the rest of the day. I can't take this harassments any longer. And he said to me, is that for good ? Are you going for good? And I asked what do you mean, I said I'm taking a sick time for the rest of the day. And again, he repeatedly asked, If I'm going for good. Feeling so bad, and embarrassed I went and signed out for the day. As I went out of the bldg, I can't help but cry uncontrollably and outpour my emotion, feeling that I was holding up while I'm being harassed and I took a cab to the ER of Northwestern Mem. Hosp. instead of going home, were my blood pressure was 200/92 and I was confined for seven days.